

LISA A. RASMUSSEN, ESQ.  
Nevada State Bar No. 7491  
**LAW OFFICE OF LISA RASMUSSEN, P.C.**  
601 South 10<sup>th</sup> Street, Suite #100  
Las Vegas, NV 89101  
Tel. (702) 471-1436  
Fax. (702) 489-6619  
Email: Lisa@LRasmussenLaw.com

MELANIE A. HILL, ESQ.  
Nevada State Bar No. 8796  
**MELANIE HILL LAW PLLC**  
520 S. 7<sup>th</sup> Street, Suite A  
Las Vegas, NV 89101  
Tel: (702) 362-8500  
Fax: (702) 362-8505  
Email: Melanie@MelanieHillLaw.com  
*Attorneys for Plaintiff Scott Friedman*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SCOTT FRIEDMAN, an individual, )  
)  
Plaintiff, )  
)  
v. )  
)  
UNITED STATES OF AMERICA; )  
GENE M. TIERNEY, individually and )  
in his official capacity as an FBI Agent; )  
MATTHEW A. ZITO, individually and )  
in his official capacity as an FBI Agent; )  
THAYNE A. LARSON, individually and )  
in his official capacity as an FBI Agent; )  
LAS VEGAS METROPOLITAN )  
POLICE DEPARTMENT; JOE LEPORE, )  
P#6260, individually and in his official )  
capacity as an officer of the LAS VEGAS )  
METROPOLITAN POLICE )  
DEPARTMENT; DARREN HEINER, )  
P#2609, individually and in his official )  
capacity as an officer of the LAS VEGAS )  
METROPOLITAN POLICE )  
DEPARTMENT; JASON HAHN, P#3371, )

Case No. 2:18-CV-000857-JCM-VCF

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE ON  
DEFENDANT, JULIE BOLTON'S  
MOTION TO DISMISS [ECF No. 56]**

(Second Request)

1 individually and in his official capacity )  
 2 as an officer of the LAS VEGAS )  
 3 METROPOLITAN POLICE )  
 4 DEPARTMENT; Tali Arik, an individual; )  
 5 Julie Bolton, an individual; and Arik )  
 6 Ventures, an entity formed by Tali Arik, )  
 Defendants. )

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7 IT IS HEREBY STIPULATED and AGREED by and between Defendant JULIE  
 8 BOLTON, by and through her counsel STEPHEN G. CASTRONOVA and THOMAS D.  
 9 DILLARD, JR., and Plaintiff SCOTT FRIEDMAN, by and through his counsel, MELANIE A.  
 10 HILL and LISA A. RASMUSSEN, that the briefing deadlines on Ms. Bolton's Motion to  
 11 Dismiss [ECF No. 56] be extended. This Stipulation is executed for the following reasons:

- 12 1. Ms. Bolton filed her Motion to Dismiss [ECF No. 56] on August 20, 2018 ("the  
 13 Motion").
- 14 2. Counsel for Plaintiff filed a Motion to Extend Deadline to Respond to Defendant,  
 15 Julie Bolton's Motion to Dismiss Plaintiff's Complaint on September 4, 2018 so that  
 16 counsel for the parties could confer in an attempt to resolve some of the arguments  
 17 made in support of the Motion to streamline to claims Plaintiff will pursue against  
 18 Ms. Bolton.
- 19 3. Counsel for the parties met and conferred on September 5, 2018 on the Motion and  
 20 agreed to extend the deadline for Plaintiff to respond to Ms. Bolton's Motion for at  
 21 least another two weeks so counsel could more meaningfully confer the following  
 22 week.
- 23 4. The Court granted Plaintiff's Motion to Extend on September 11, 2018 extending the  
 24 deadline to oppose Ms. Bolton's Motion to September 11, 2018.
- 25 5. Counsel for the parties further met and conferred on September 11, 2018 to discuss  
 26 streamlining the claims and Plaintiff amending the Complaint against Ms. Bolton to  
 27 address counsel's arguments in Ms. Bolton's Motion.  
 28

6. Counsel for the parties agreed to extend Plaintiff's deadline to file a response to Ms. Bolton's Motion to September 28, 2018 to allow the parties additional time to confer and determine how best to proceed against Ms. Bolton. Counsel for the parties further agreed to extend the deadline for Ms. Bolton to file a reply to October 12, 2018.

7. The request for additional time in this Stipulation is made in good faith.

8. The requested extension is not for purposes of delay, but to avoid unnecessary litigation or the wasting of resources and expense on issues that can be resolved between counsel for the parties or through amendment of the complaint.

Dated this 11th day of September, 2018.

Respectfully submitted by,

CASTRONOVA LAW OFFICES, PC

MELANIE HILL LAW PLLC

By: /s/ Stephen G. Castronova  
STEPHEN G. CASTRONOVA  
Nevada Bar No. 7305  
Attorney for Defendant Julie Bolton

By: /s/ Melanie A. Hill  
MELANIE A. HILL  
Nevada Bar No. 8796  
Attorney for Plaintiff Scott Friedman

OLSON, CANNON, GORMLEY,  
ANGULO & STOBERSKI

LAW OFFICE OF LISA RASMUSSEN, P.C.

By: Thomas D. Dillard, Jr.  
THOMAS D. DILLARD, JR.  
Nevada Bar No. 6270  
Attorney for Defendant Julie Bolton

By: /s/ Lisa A. Rasmussen  
LISA A. RASMUSSEN  
Nevada Bar No. 7491  
Attorney for Plaintiff Scott Friedman

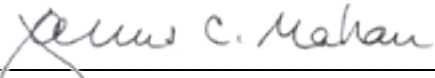
### **ORDER**

This matter came before the Court on the parties' Stipulation and Order to Extend Briefing Schedule on Defendant, Julie Bolton's Motion to Dismiss. Based on the stipulation of the parties, and finding that the extension request is made in good faith, to avoid unnecessary litigation or the wasting of resources and expense, and not for the purposes of undue delay,

1 IT IS HEREBY ORDERED that the deadline for Plaintiff to file a response to Ms.  
2 Bolton's Motion is extended to September 28, 2018.

3 IT IS FURTHER ORDERED that the deadline for Ms. Bolton to file a reply is extended  
4 to October 12, 2018.

5 Dated September 12, 2018.

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9 JAMES C. MAHAN  
10 UNITED STATES DISTRICT JUDGE  
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